

EX PARTE OR LATE FILED

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JUN 25 1996

Jay C. Keithley  
Vice President  
Law & External Affairs

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

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Suite 1100  
Washington, DC 20036  
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**EX PARTE**

June 25, 1996

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, NW -- Room 222  
Washington, DC 20554

Re: In the Matter of Implementation of Local Competition  
Provisions of the Telecommunications Act of 1996  
CC Docket No. 98-98  
96

Dear Mr. Caton:

On June 11, 1996 representatives from Sprint Corporation met with Stuart Kupinsky and several of his colleagues in the Common Carrier Bureau Policy Division to discuss Sprint's positions in the above referenced proceeding. A copy of Sprint's June 11 Ex Parte notice is attached for your convenience. In the meeting, Sprint committed to provide additional information concerning the development of industry standards for "electronic bonding" and the Sprint LECs' present ability to provide "electronic bonding."

Attached are three documents providing such additional information. The first, consisting of one page and entitled Electronic Bonding: ECIC Definition and Status, is self-explanatory; the second, a 15-page overview of the ECIC's mission, membership, and structure; the third, consisting of two pages and entitled Electronic Bonding, describes the Sprint LECs' current practices regarding the processing of customer and interexchange carrier service orders and their proposed process for handling CLEC service orders.

I ask that this letter, with attachments, be included in the record of this proceeding. Thank you for your attention to this request.

Sincerely,

Jay Keithley

No. of Copies rec'd  
List ABCDE

011

cc: S. Kupinsky  
K. Gude  
B. McDonald  
P. Gallant  
A. Ros  
R. Tanner  
D. Maisel



1850 M. Street, N.W., Suite 1100  
Washington, DC 20036

June 11, 1996

William F. Caton  
Acting Secretary  
Federal Communications Commission  
Room 222  
1919 M St., NW  
Washington, D.C. 20554

Re: EX PARTE PRESENTATION  
CC Docket No. 96-98

Dear Mr. Caton:

Today, Leon Kestenbaum, Jay Keithley and I met with Stuart Kupinsky; Kalpak Gude; Bob McDonald; Paul Gallant; Augie Ros; Robert Tanner; and Deborah Maisel of the Policy Division to discuss interconnection requirements under the 1996 Telecommunications Act. Sprint's substantive comments were consistent with points raised in its pleadings in the above-captioned proceeding. Sprint also committed to seek additional information regarding the ability to offer vertical features on an unbundled basis and the status of efforts to develop standards for "electronic bonding" in industry fora.

An original and one copy of this letter are being filed.

Sincerely,

A handwritten signature in cursive script, appearing to read "Norina Moy".

Norina Moy  
Director, Federal Regulatory  
Policy and Coordination

cc: S. Kupinsky  
K. Gude  
B. McDonald  
P. Gallant  
A. Ros  
R. Tanner  
D. Maisel

## **ELECTRONIC BONDING: ECIC DEFINITION AND STATUS**

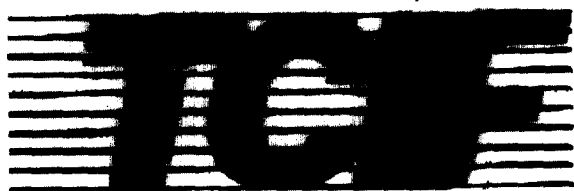
The Electronic Communications Implementation Committee ("ECIC"), a working committee under the Telecommunications Industry Forum ("TCIF") of the Alliance for Telecommunications Industry Solutions ("ATIS"), has defined "electronic bonding" as the:

... interactive electronic information exchange involving application-to-application communications between telecommunications jurisdictions, as defined in the Telecommunications Management Network architectures, to support Operations, Administration, Maintenance and Provisioning.

ECIC, like the TCIF and the ATIS, is not a sanctioned standards setting body. The ECIC is tasked to develop guidelines for implementing electronic bonding, including guidelines to identify and resolve technical and operations issues associated with implementation of electronic bonding. Guidelines are developed for specific applications, which are identified and prioritized by consensus by the ECIC Steering Committee. ECIC's guidelines are not mandatory and joint (bilateral) implementation agreements may vary from the guidelines.

To date, the ECIC has developed guidelines for a Trouble Administration application. A guideline for the Preferred Interexchange Carrier/Customer Account Record Exchange application is close to completion. Work on a guideline for the Ordering/Provisioning application is just beginning. Other applications, for which priorities have not been established, include: Performance Monitoring, Alarm Monitoring, Network Management, Traffic Management, Testing (and Reporting Results), Ordering CLEC Services (include Resale), Ordering SONET, Product Availability/Capability, Electronic Bonding for Government and Large Customers, and Intercompany Billing.

Both the local and long distance divisions of Sprint actively participate in the ECIC.



**Electronic Communications Implementation Committee**

**ECIC**

**Revised 6/96**

**ECIC/MEM/95-001 R2**

**Electronic Communications Implementation Committee**

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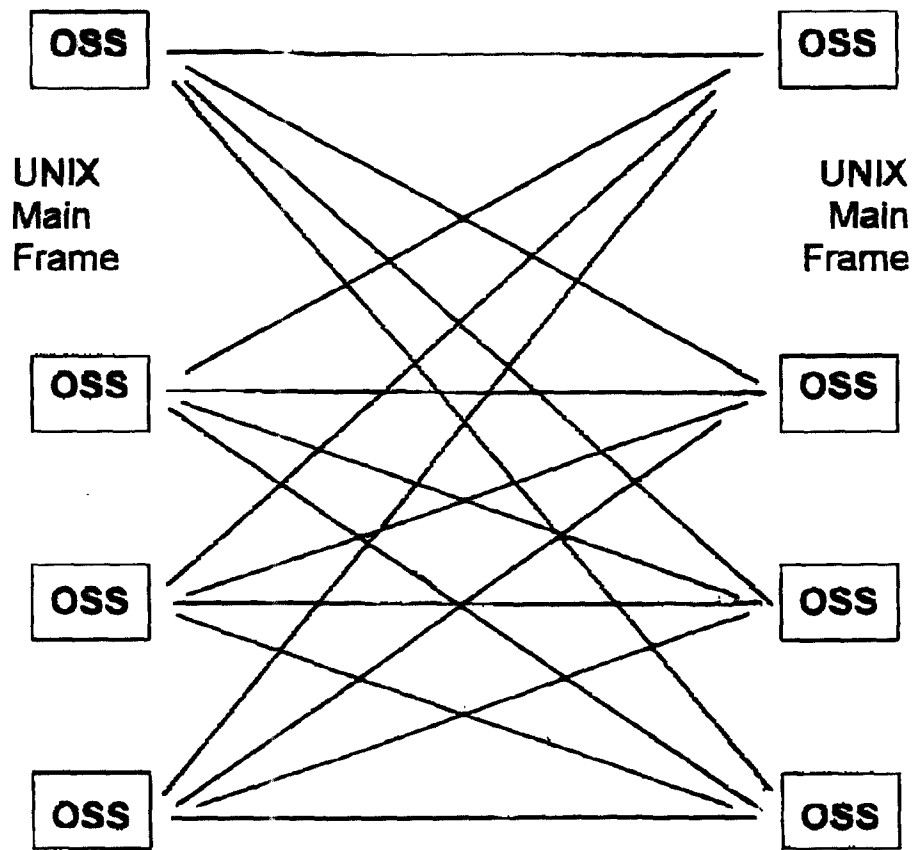
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**Electronic Communications Implementation Committee**

**THE INTEROPERABILITY PROBLEM**

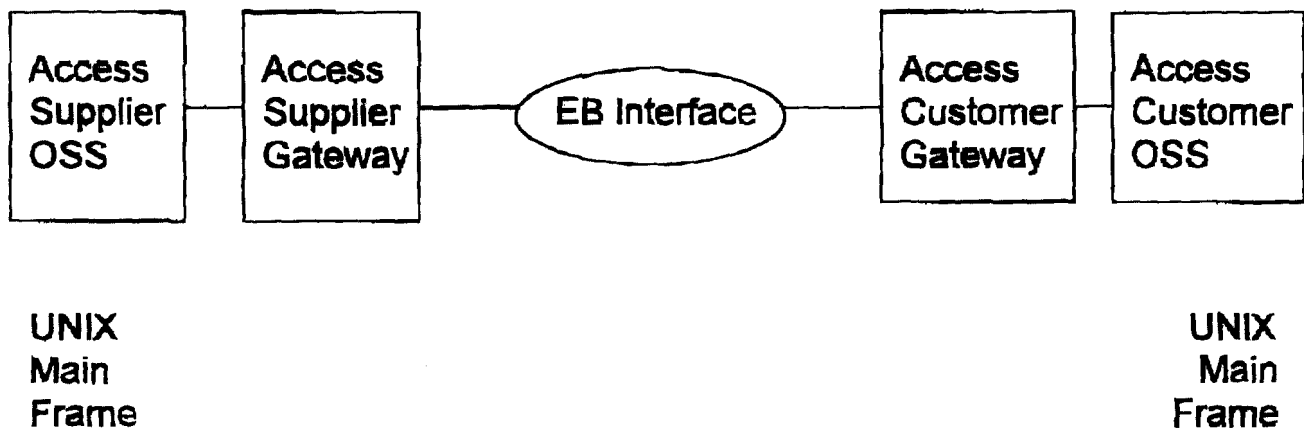
**CUSTOMER**

**SUPPLIER**



**Electronic Communications Implementation Committee**

**THE ELECTRONIC BONDING SOLUTION**





# **Electronic Communications Implementation Committee**

## **ECIC HISTORY**

**Formed June, 1993 as the Electronic Bonding Implementation Team (EBIT)**

**EBIT General Membership Meeting - February, 1994**

- Steering Committee Recommends Name Change to:  
    "Electronic Communications Implementation Forum (ECIF)"
- Membership Subcommittee Recommends ATIS Sponsorship
- Formal Application submitted to ATIS on March 14, 1994

**ECIF General Membership Meeting - May, 1994**

- Presentation by TCIF, an ATIS Sponsored Forum
- ECIF Steering Committee Votes to Become a Working Committee  
    under TCIF

**TCIF General Membership Meeting - June, 1994**

- ECIF Accepted as a Member of TCIF

**ECIF General Membership Meeting - September, 1994**

- Steering Committee Recommends Name Change to:  
    "Electronic Communications Implementation Committee (ECIC)"



## Standards Committee T1-Telecommunications



**T1A1**  
Performance and  
Signal Processing  
Network  
Survivability  
Power Data and  
ISDN Performance

**T1E1**  
Power Systems  
Power Interlocks  
Analog Access  
Wideband Access  
DSL Access

**T1B1**  
Interconnect  
Planning/Engineering  
Testing and  
Operations Systems  
and Protocols

**T1P1**  
Personal  
Communications  
Wireless Access and  
Terminal Mobility  
Program Management  
and Standards

**T1S1**  
Architecture  
and Services  
Switching and  
Signaling Protocols  
Broadband ISDN

**T1X1**  
Synchronization  
Interfaces  
Metallic and Optical  
Hybrid  
Interfaces

## Carrier Liaison Committee



**Network  
Operations Forum**  
Installation, Testing,  
and Maintenance  
**Network  
Management**  
SS7 Network Testing  
Toll Fraud Prevention

**Industry Officers  
Responsibility  
Forum**  
Industry Numbering  
Committee  
Data Integrity Group  
LANE Users Group

**Marketing and  
Billing Forum**  
Access Ordering,  
Provisioning and  
Billing  
Carrier Selection  
and Subscription  
Message Processing

**ATIS 900 Series  
Committee**  
900000 Service  
Provider Interface  
LEC 900 Database  
Participation  
900 Customer Record  
Lead Validation

## Telecommunications Industry Forum



**Bar Code**  
Bar Code Label  
Specifications  
**Product Package  
Guidelines**

**Information Product  
Interchange**  
Standard  
Generalized Markup  
Language  
Technical Illustrations  
Interchange

**Spacenet Coding**  
Product Identification  
Interchange  
Guidelines  
**Telecommunications  
Industry Product  
Identifier**

**Electronic Data  
Interchange**  
Data Interchange  
Standards  
EDI Guidelines

**Network  
Centers**  
Electronic  
Communications  
Re-engineering  
Business Processes

**Electronic  
Communications  
Implementation  
Committee**  
Interactive Electronic  
Information  
Implementation  
of Electronic  
Communications

## Information Industry Liaison Committee



**Open Network  
Architecture**  
Onix Services  
User Guide  
Evolving Network  
Services Architecture

## Network Reliability Steering Committee



**Analyze Network  
Outages**  
Initiate Corrective  
Action  
Industry/FCC Reports  
Liaison with Network  
Reliability Council

## Electronic Communications Service Provider Committee



**Liaison with  
Law Enforcement  
Agencies on Network  
Technology and  
Court Authorized  
Electronic  
Surveillance**

## Protection Engineers Group



**Physical Protection  
Equipment**  
Access Unit  
Standards and  
Specifications

## Standards Committee 05 Wood Poles and Products



**Wood Crossarms  
and Timber for Utility  
Structures**  
ANSI Standards  
for Wood Poles,  
Crossarms,  
and Braces

## **Electronic Communications Implementation Committee**

### **ECIC PURPOSE**

The purpose of the Electronic Communications Implementation Committee (ECIC) is to facilitate a common understanding of electronic communications standards and related technologies, as well as to develop guidelines for implementation of interactive electronic information exchange (i.e. - Electronic Bonding).

### **ECIC MISSION**

The mission of the Electronic Communications Implementation Committee (ECIC) is to identify and resolve technical and operational issues for the implementation of electronic bonding. The focus of the Committee is application-to-application communications between telecommunications jurisdictions, as defined in Telecommunication Management Network (TMN) architectures, to support Operations, Administration, Maintenance, and Provisioning (OAM&P).

## **Electronic Communications Implementation Committee**

### **ECIC SCOPE**

The scope of the Electronic Communications Implementation Committee (ECIC) to:

1. Provide guidelines for the voluntary implementation of OAM&P standards.
2. Identify new and additional OAM&P functionalities for standardization; recommend and support their development within the appropriate industry forums and standards bodies.
3. Address, as appropriate, any other issues of common interest that involve the implementation of electronic bonding and are consistent with the ECIC purpose and mission.

# **Electronic Communications Implementation Committee**

## **CURRENT TCIF MEMBER COMPANIES REPRESENTED IN ECIC**

Ameritech  
AT&T  
Bell Atlantic  
BellSouth  
Cincinnati Bell  
DSET  
GTE  
MCI  
NYNEX  
Objective Systems Integrators  
OpenCon Systems  
Pacific Bell  
Pirelli Cable  
SNET  
Southwestern Bell  
Sprint  
Touch of Gray Engineering  
Telegenics  
Teleport  
US West

# **Electronic Communications Implementation Committee**

## **ORGANIZATIONAL STRUCTURE**

### **STEERING**

Chair	Becky Higdon	BellSouth	205-977-1093
Vice Chair:	Jerome Melson	AT&T	513-629-6587
Admin. Sec.	Gerry Caprio	Bellcore	908-899-5845

### **CHANGE MANAGEMENT**

Co-chair	Tom Sweeney	AT&T	908-231-8010
Co-chair	Jim Meade	NYNEX	212-395-3472

### **CONNECTIVITY**

Co-chair	Kathleen Killen	GTE	813-979-5351
Co-chair	Tom Barrett	Pacific Bell	510-823-1941

### **DATA RECONCILIATION**

(Currently Inactive)

### **MEMBERSHIP**

Chair	Ray Eisemann	Ameritech	414-678-3103
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### **ORDERING**

Co-chair	Jason Donahue	ADC	612-946-3150
Co-chair	John Ng	Bellcore	908-758-2380
Co-chair	Joann Rainey	GTE	813-228-3528

### **PIC/CARE**

Co-chair	Angela Prokopczyk	AT&T	908-221-3837
Co-chair:	Mary Cooley	US WEST	303-896-4963

### **SECURITY**

Co-chair	Moshe Rozenblit	Bellcore	908-758-4151
Co-chair	Venkat Rao	GTE	813-979-5343

### **TESTING**

Chair	Maria Mayo	BellSouth	770-209-8237
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### **TROUBLE ADMINISTRATION**

Co-chair	Toni Sarasua	Pacific Bell	510-901-6261
Co-chair	Sharon Thorndale	GTE	214-718-3781

**Electronic Communications Implementation Committee**

**STEERING SUBCOMMITTEE**

**(VOTING MEMBERS OF ECIC)**

Phil Robinson	Ameritech	708-248-4260
Jerome Melson, Vice Chair	AT&T	513-629-6587
Bob Nacey	Bell Atlantic	412-366-5331
Becky Higdon, Chair	BellSouth	205-977-1093
Julie Maier	Cincinnati Bell	513-397-7227
Bill Arkwright	GTE	813-979-5358
Linda Henderson	MCI	703-506-6020
Jerry Stroud	NYNEX	212-395-8618
Aaron Baker	Pacific Bell	415-545-7757
Greg Weber	Southwestern Bell	314-235-3475
Bob Buegler	Sprint	913-534-5131
Mike Johnson	US West	303-965-1416

**Administrative Secretary**  
**Gerry Caprio**

**Bellcore**

**908-699-5645**

# **Electronic Communications Implementation Committee**

## **SUBCOMMITTEES**

### **TROUBLE ADMINISTRATION**

The Trouble Administration Subcommittee will provide clarification of attributes and their use as specified in standards documents. The subcommittee will also be an interface with the T1M1 bodies relative to proposals for new attributes or changes to existing attributes.

A generic MOCS for current and future attributes will be provided. Additionally, the subcommittee shares in the development of mapping attributes to existing OSSs.

### **PRIMARY INTEREXCHANGE CARRIER (PIC)**

### **CUSTOMER ACCOUNT RECORD CHANGE (CARE)**

The PIC Subcommittee will provide clarification of attributes and their use as specific in the Standards Documents. The subcommittee will also be an interface with the T1M1 bodies and the Ordering and Billing Forum on proposals for new attributes or changes to existing attributes.

A generic MOCS for current and future attributes will be provided. Additionally, the subcommittee shares in the development of mapping attributes to existing OSSs.



## **Electronic Communications Implementation Committee**

### **ORDERING**

The Ordering Subcommittee will identify and resolve technical and operational issues for the implementation of electronic ordering. It will also provide guidelines for the voluntary implementation of OAM&P ordering standards through identification of functionality for standardization and recommendation for their development within the appropriate industry forums and standards bodies.

### **SECURITY**

The Security Subcommittee will focus on the external interface (i.e., the "X" interface) between two Telecommunications Managed Networks (TMNs) or jurisdictional boundaries. The subcommittee will address the security of services and communications across the "X" interface. A generic security requirements document will be developed for ECIC use.

### **TESTING**

The Testing Subcommittee will recommend to the ECIC preferred testing strategies for the implementation of real-time application-to-application interfaces based on ANSI T1M1 standards across jurisdictional boundaries. The strategies shall include conformance, interoperability, and life cycle testing.

## **Electronic Communications Implementation Committee**

### **CONNECTIVITY**

The purpose of the Connectivity Subcommittee is to document OSI layers 1 through 4 recommendations to implement existing standards. These recommendations facilitate an interoperable interface between Electronic Bonding gateway systems. The scope of the initial documentation is based on ANSI T1.224, which references T1.204, specifically supporting the implementation of Gateway-to-Gateway communication via the X.25 Packet Switching Network.

### **CHANGE MANAGEMENT**

The Change Management Subcommittee will develop the generic process flows and procedures required to implement the information exchange between network jurisdictions. These changes can be initiated by either jurisdiction.

### **DATA RECONCILIATION**

The Data Reconciliation Subcommittee will determine a generic process for the exchange of data between members as well as define a minimum set of data elements that must be exchanged in order to identify the subject of the communications between its members. The initial focus of the subcommittee's efforts will be on trouble administration.

## **Electronic Communications Implementation Committee**

### **MEMBERSHIP**

The Membership Subcommittee provides appropriate information to all prospective ECIC members and conducts an Orientation Program for all new participants at ECIC quarterly meetings. The Subcommittee also updates and informs the ECIC membership regarding new member inquiries and applications.

### **FUTURE APPLICATIONS**

- **PERFORMANCE MONITORING**
- **NETWORK MANAGEMENT**
- **TRAFFIC MANAGEMENT**
- **ALARM MONITORING**
- **TESTING**
- **BILLING**

# **Electronic Communications Implementation Committee**

## **GUIDELINES**

### **CONSENSUS DECISIONS**

Consistent with the TCIF Bylaws all recommendations are made on a consensus basis by the members.

### **BALLOTING**

The TCIF Letter Ballot procedures are followed for the approval process for all formal documents.

### **DOCUMENTATION**

A Documentation Standard has been adopted to number ECIC documents. The **ECIC Guidelines** contain the day to day operating procedures for ECIC and its subcommittees.

## **1996 MEETING SCHEDULE**

<b>DATE</b>	<b>PLACE</b>
March 18 - 21	Orlando, FL
June 17 - 20	St. Petersburg, FL (With TCIF)
September 16 - 19	Washington (No. VA)
December 2 - 5	Dallas (With TCIF)

## ELECTRONIC BONDING

### **1. Local Customers**

At this time, Sprint Local Telecommunications Division (LTD) has no applications using Electronic Bonding for local exchange customers. Many industry representatives characterize Electronic Bonding as the “real time” exchange of information, likely to entail access to LEC systems on an individual customer basis. Most, if not all, Sprint LTD systems are “batch” systems whereby data is entered into a terminal/main frame system and transferred to the appropriate area or department for processing.<sup>1</sup> This is generally done for large numbers or groups of customer requests. The initial point of contact between Sprint LTD and end user customers is the local business office. Sprint LTD operates 34 business offices in 19 states where customers can walk-in or call-in to order local telephone services. Sprint also operates 65 payment centers in the same 19 states where customers can make payments for telephone service and use a courtesy telephone to speak with one of the 34 business offices. The local business office is the end user customer’s point of contact for placing orders for telephone service, billing inquiries, or payment of bills.

The Sprint LTD business offices use a system known as SOE/CRB to establish local customer accounts and to establish billing records. The Service Order Entry/Customer Record Billing system uses a “batch” process. When a new, local customer contacts Sprint through a business office or payment center, the Service Representative will either manually or through a computer terminal enter the appropriate information to establish telephone service. The SOE/CRB system will disseminate the information to the various Sprint LTD departments. For example, a copy of the information will go to the Installation and Repair Department in order to coordinate the assignment of central office, outside plant facilities, and the scheduling of an installer. A copy will go to the ARB (Automated Repair Bureau) Section in order to establish a repair record for future use, a copy will go to Directory Section in order to establish a directory assistance record and a copy will go to the Accounting Section in order to establish customer billing records. All of the information through the SOE/CRB is processed on a “batch” basis and is not performed on a “real time” basis. To accomplish transfer of information on a “real time” basis will entail the re-coding of all SOE/CRB systems and subsystems.

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<sup>1</sup> True Electronic Bonding will entail a change in coding.

## ELECTRONIC BONDING

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### 2. **Interexchange Carrier Customers**

One example of the way Sprint LTD exchanges information with Interexchange Carrier Customers (ICs) is Sprint LTD's CARE process. CARE or Customer Account Record Exchange, is used to exchange information with ICs to accommodate billing, Primary IC (PIC) changes, or other inquiries. CARE is a "batch" process system whereby large amounts of information are exchanged via a data circuit between an IC and LEC. Under the CARE process, the IC and LEC "systems" are not compatible. The IC's data is downloaded and read by the LEC and the LEC will respond by uploading data for return to the IC.

Sprint LTD has three Interexchange Carrier Service Centers (ICSC) which handle IC requests for access service and inquiries. These are located in Leesburg, Florida; Tarboro, North Carolina; and Gardner, Kansas.

### 3. **Proposed for CLECs**

Tentative plans call for CLEC requests for services to be handled at the IPOC - Initial Point of Contact Center in Decatur, Indiana. The IPOC will process CLEC service order requests. If a CLEC requires transport services from Sprint, they will be referred to one of three Sprint National Access Service Centers located at the ICSC listed above. Sprint is currently investigating the purchase of an Electronic Bonding "platform" from GTE.